

EXHIBIT A

SMITHERS

VS.

FRONTIER AIRLINES INC

Deposition

SHAWN P. CHRISTENSEN

04/17/2019

AB Court Reporting & Video

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Civ. Action No. 1:18cv676 (TSE/IDD)

30(b)(6) DEPOSITION OF FRONTIER AIRLINES, INC., as
given by SHAWN P. CHRISTENSEN
April 17, 2019

ANNE SMITHERS, et al.,

Plaintiffs,

vs.

FRONTIER AIRLINES INC.,

Defendant.

1 APPEARANCES:

2 STONE & WOODROW LLP

By Thatcher Stone, Esq.

3 William T. Woodrow, III, Esq. (via
videoconference)

4 Suite 201, Louis & Clark Plaza

250 West Main Street

5 Charlottesville, Virginia 22902

Appearing on behalf of Plaintiffs.

6 CHARLSON BREDEHOFT COHEN & BROWN, P.C.

7 By Elaine Charlson Bredehoft, Esq.

11260 Roger Bacon Drive, Suite 201

8 Reston, Virginia 20190

Appearing telephonically on behalf of
9 Defendant.

10 CONDON & FORSYTH LLP

By Bartholomew J. Banino, Esq.

11 7 Times Square

New York, New York 10036

12 Appearing on behalf of Defendant.

13 Also present: Anne Smithers, via
14 videoconference

1 All right. I'd like to go back to just
2 for a minute or two to your preparation for this
3 deposition.

4 Leaving aside whatever documents may have
5 been given to you by the lawyers, did you otherwise
6 review all the documents here at Frontier's
7 headquarters in Denver, in between downtown and the
8 airport?

9 MR. BANINO: Sorry, are you asking all
10 documents?

11 MR. STONE: I'm asking what he reviewed,
12 where did he review them, other than the stuff you
13 gave him.

14 A I reviewed --

15 MR. BANINO: Asked and answered, but go
16 ahead and answer again.

17 A I reviewed the documents that I received
18 from counsel.

19 Q (By Mr. Stone) You didn't receive
20 anything from anybody else?

21 A No.

22 Q You didn't do any independent
23 investigation?

24 A No.

25 Q Okay. You didn't talk to the young lady